

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Christine Bennett

) **Chapter 13**

) **Bankruptcy No. 19-11414**

Debtor(s))

MOTION TO ABATE AND MODIFY CHAPTER 13 PLAN POST-CONFIRMATION

Pursuant to L.B.R. 3015-5, the debtor(s) request(s) an order permitting modification of the Chapter 13 plan post-confirmation and make(s) the following representations in support of this request:

1. The debtor(s) filed this Chapter 13 bankruptcy petition on March 7, 2019.
2. The Chapter 13 Plan was confirmed on October 16, 2019.
3. The base amount of the confirmed Plan is \$10,446.98, including trustee's commission. Debtor's plan payment was \$181.66 per month.
4. To date, Debtor has paid \$8,299.00 and is in arrears \$1,058.02.
5. Debtor fell behind on plan payments due to illness and reduction in income. Debtor has resumed her full employment and will be able to pay the plan going forward.
6. Debtor proposes to amend the plan post-confirmation to abate six (6) months of plan payments. The new plan payment will be \$306.85 per month for the remaining 7 months of the 60-month Plan, starting with the September 2023 payment, an increase of \$125.19 per month over the confirmed Plan payment.
7. A copy of the proposed modified plan and amended I and J will be filed.

WHEREFORE, the Debtor prays that this Court grant the Motion to Abate and Modify Chapter 13 Plan Post-Confirmation.

/s/ Sharon S. Masters, Esq.
Sharon S. Masters, Esq.
Counsel for Debtor(s)

Dated: 8/22/2023